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Admitted in: MA, ME, NH

December 12, 2023

VIA EMAIL to MaineECFIntake@med.uscourts.gov

Christa K. Berry
Clerk of Court, United States District Court of the District of Maine
Edward T. Gignoux United States Courthouse
156 Federal Street
Portland, ME 04101

Re: *Central Maine Power Company v. Maine Commission on Governmental Ethics and Election Practices, et al.*

Dear Ms. Berry:

I write on behalf of Plaintiff Central Maine Power Company ("CMP") with respect to CMP's Motion for Preliminary Injunction and Incorporated Memorandum of Law (the "Motion"), filed this same day with CMP's Complaint in this matter.

This action concerns "An Act to Prohibit Campaign Spending by Foreign Governments and Promote an Anticorruption Amendment to the United States Constitution" (the "Initiative"), which Maine voters adopted in Maine's November 2023 general election. By operation of Maine law, the Initiative will become effective on Friday, January 5, 2024.

The Initiative violates, among other things, the First and Fourteenth Amendments to the United States Constitution. As set forth in the Motion, the effectiveness and imminent enforcement of the Initiative—which includes criminal penalties for violations of its terms—will cause CMP irreparable harm. Accordingly, CMP respectfully requests the Court convene a conference of counsel as soon as possible to discuss a briefing schedule for the Motion.

Undersigned counsel for CMP can represent to the Court that all Defendants are represented by Assistant Attorneys General Jonathan R. Bolton and Paul Sutter, who have been aware of this action for several weeks and with whom undersigned counsel has conferred about a potential briefing schedule. Undersigned counsel copied Attorney Bolton and Attorney Sutter on the case opening email sent to the Court, which included the Motion and all documents filed in support thereof.

Lastly, CMP is aware that three other complaints have been or will be filed by other parties challenging the Initiative. CMP respectfully suggests that the Court may wish to hold one conference of counsel that includes all parties challenging the Initiative, as the Court ultimately may wish to consolidate these cases pursuant to Rule 42(a) of the Federal Rules of Civil Procedure.

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Thank you for your attention and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Dunlap", with a long horizontal flourish extending to the right.

Joshua D. Dunlap

cc: Jonathan R. Bolton, AAG (via email: jonathan.bolton@maine.gov)
Paul Switter, AAG (via email: paul.switter@maine.gov)